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11
12 **UNITED STATES DISTRICT COURT**
13
14 **DISTRICT OF NEVADA**

15 HANIT OHAION,

16 Plaintiff,

17 v.

18 EQUIFAX INFORMATION SERVICES,
19 LLC, AND BANK OF AMERICA, N.A.,

20 Defendants.

Case No. 2:21-CV-02198-GMN-BNW

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(Third Request)

21 Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of
22 record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's
23 Complaint (Third Request):

24 On December 14, 2021, Plaintiff filed his Complaint [ECF No. 1]. The Summons to
25 Defendant was issued on December 14, 2021 [ECF No. 4] and purportedly served on December
26 16, 2021.

27 On January 11, 2022, this Court entered its Order on BANA's Unopposed Motion to
28 Extend Time to Respond to Plaintiff's Complaint (First Request), which extended the deadline for
BANA to respond to the Complaint to February 7, 2022. [ECF No. 11]

On February 8, 2022, this Court entered its Order on BANA's Unopposed Motion to
Extend Time to Respond to Plaintiff's Complaint (Second Request), which extended the deadline
for BANA to respond to the Complaint to February 22, 2022. [ECF No. 15]

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2 Plaintiff and BANA have discussed extending the current deadline an additional 15-days,
3 while the parties continue to explore early settlement to avoid additional time, fees, and costs
4 associated with litigation. Plaintiff has approved the 15-day extension, which would make the new
5 response deadline March 9, 2022.

6 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline
7 for BANA to file its response to Plaintiff's Complaint to March 9, 2022. This is the third
8 request for extension of time for BANA to respond to Plaintiff's Complaint. The extension is
9 requested in good faith and is not for purposes of delay or prejudice to any other party.

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11 Dated this 18th day of February, 2022.

12 WRIGHT, FINLAY & ZAK, LLP

13 /s/ Jory C. Garabedian

14 Darren T. Brenner, Esq.

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20 *Attorneys for Bank of America, N.A.*

21 **IT IS SO ORDERED:**

22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATED: February 22, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 18, 2022, and pursuant to Fed. R. Civ. P. 5(b), I served via the CM/ECF electronic filing system a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to the parties below:

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